

November 5, 2009

Ms. Gail Mitchell, Deputy Director Clean Water Enforcement Branch Water Protection Division U.S. Environmental Protection Agency, Region 4 61 Forsyth Street, SW Atlanta, GA 30303-8960

Re: Information Request Pursuant to Section 308 of the Clean Water Act Private Drinking Water Well Monitoring Report

Dear Ms. Mitchell,

In accordance with the Information Request pursuant to Section 308 of the Clean Water Act dated October 6, 2009, Dalton Utilities is submitting to EPA for review and approval the Private Drinking Water Well Monitoring Report (see Attachment A).

If you have any questions, please contact me at 706-529-1091 or dcope@dutil.com.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false



Ms. Gail Mitchell November 5, 2009 Page 2 of 2

information, including the possibility of fine and imprisonment for knowing violations.

Sincerely,

Don Cope

President & CEO

Attachment

c: Mr. Allen Barnes, Georgia Environmental Protection Division (cover letter only)
Dr. Marlin Gottschalk, Sustainability Division Georgia Department of Natural
Resources (cover letter only)

Dr. Bert Langley, Georgia Environmental Protection Division (cover letter only) Lee A. DeHihns, Esq.



Private Drinking Water Well Monitoring Report

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Executive Summary

In May 2009, Dalton Utilities collected samples at various locations on the LAS. In response to sample results obtained from the ground water monitoring wells on the LAS, Dalton Utilities decided to conduct a drinking water well survey to identify private drinking water that had the potential to have been impacted by the ground water coming from the LAS. Dalton Utilities designed the well survey to begin in the immediate vicinity of the LAS in areas deemed to be downgradient and where it was questionable as to the availability of public drinking water and then expand out to test all residential locations that use a well for potable water in a one mile radius around the LAS property boundary.

The private drinking water well survey was conducted in accordance with Dalton Utilities Private Drinking Water Well Survey Protocol. The private drinking water well survey began in August 2009 and is essentially complete. The lists of residential locations by road name were confirmed and corrected using actual field surveys of each and every road to ensure all locations were identified and included in the private well survey. Each location was cross checked against Dalton Utilities drinking water customer database in addition to the other public drinking water systems in the area. Any location not shown to have public drinking water was surveyed to determine if the location utilized a private well for its drinking water source. If a private well was being utilized for drinking water, the well was immediately sampled to determine the levels of Perfluoridated Compounds (PFCs), if any, in the private well.

The private drinking water wells sample results indicated 102 wells did not have levels of PFOA and PFOS above the contract laboratory's reporting limit or level of quantification. Seven wells indicated levels of PFOA or PFOS at or above the contract laboratory's reporting limit or level of quantification and require quarterly sampling for at least four consecutive quarters. One well was indicated a level of PFOS at or slightly above the published public health advisory level. The resident at this location is being provided bottled water pending connection to public water. None of the wells sampled indicated levels of PFOA above the published public health advisory level.

Beyond these follow up actions and based on the results of the private drinking water well survey, no additional survey work is required at this time.

Drinking Water Well Monitoring Report

1. Identified Locations for Survey

In accordance with Dalton Utilities Private Drinking Water Well Survey Protocol, all locations within a one mile radius of Dalton Utilities Land Application System (LAS) boundary were compiled. These locations were then cross referenced against Dalton Utilities' customer database in addition to the other public drinking water systems in the area. Any location not shown to have public drinking water was compiled as locations for potential sampling as part of this project.

These locations were then contacted via telephone and/or in person by representatives of Dalton Utilities to verify if a private drinking water well was being utilized by the residence. If a private well was being utilized as the primary drinking water source, permission was obtained from an adult resident to sample the well with respect to PFCs. If a public water system connection was being utilized as the primary source of drinking water, it was noted in the records and no sample was collected.

All locations noted in the field to not be a part of the existing list of potential survey locations were added to the list and the residents contacted to determine the presence of a private drinking water well and sampling conducted, if necessary. Any location found to utilize a public drinking system connection was noted as such in the survey records and no sample was collected.

At the suggestion of the United States Environmental Protection Agency (EPA), Dalton Utilities sought to review any Intent to Drill forms the Whitfield County and Murray County Health Department possessed for locations within the survey's one mile radius. Per the District Director of Environmental Health of the North Georgia Health District, which includes Whitfield and Murray Counties, they do not have any such forms for locations within the targeted area. Therefore, no additional locations were compiled from this source. The correspondence from the North Georgia Health District to Dalton Utilities dated October 20, 2009, is attached herein as Attachment A.

To ensure no additional locations exist in the survey radius, Dalton Utilities has requested all available information from the Georgia Environmental Protection Division as they are the governing agency for well drillers in the State of Georgia per the North Georgia Health District's correspondence. Any additional locations in the survey radius determined to not be part of the initial survey will be added to the list and the residents contacted to determine the presence of a private drinking water well and sampling conducted, if necessary. Any subsequent analytical results received by Dalton Utilities pursuant to this sampling will be submitted to EPA within five (5) days and included in the monthly progress report to EPA in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

To date, Dalton Utilities has surveyed over 1,900 locations on XX roads to determine the existence of a private drinking water well within the one mile radius of Dalton Utilities Land Application System (LAS) boundary. All of the locations compiled through the methodology delineated in the Dalton Utilities Private Drinking Water Well Survey Protocol have been surveyed.

2. Sample Collection

Identified locations were verified to utilize either a public water system connection or private well as their primary source of drinking water. If a private drinking water well was being utilized, a sample was collected immediately after obtaining verbal permission from an adult resident. The sample was collected by qualified personnel and in accordance with EPA's Standard Operating Procedure for Potable Water Supply Sampling, SESDPROC-305-R1. Latitudes and longitudes, using Global Positioning System (GPS) equipment, were also obtained for each sample collection location.

The sample was then properly labeled and submitted to a contract laboratory for analysis of the compounds indicated in Attachment B. At the time of this survey, the selected contract laboratory did not have standards and/or validated methods developed for the additional Perfluoridated chemicals (PFCs) noted in the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. As such, the list of compounds indicated in Attachment B reflects the full current analytical capabilities of the contract laboratory as well as the corresponding detection limits with respect to PFCs.

To date, Dalton Utilities has verified that 1,760 locations surveyed utilized a public water system connection. 115 private wells were found as being utilized as primary sources of drinking water. Verbal consent was obtained from an adult resident for 110 of the private drinking water wells. The residents at five locations found to utilize a private drinking water well refused to grant Dalton Utilities access to the private well for sampling purposes (see Attachment C for locations). All 110 of the consenting locations were sampled immediately following verification and consent and were analyzed for the compounds listed in Attachment B.

3. Vacant Residences

For locations where there were no signs of occupancy, such as foreclosed or abandoned properties, contact with a resident could not be made. Dalton Utilities is researching property records to determine additional means of notification and sending written correspondence to these addresses requesting the owner contact Dalton Utilities to determine the existence of a private drinking water well and coordinate sampling of the well, if any. Any subsequent analytical results received by Dalton Utilities pursuant to this sampling will be submitted to EPA

within five (5) days and included in the monthly progress report to EPA in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

4. Sample Analyses

Post collection, samples were properly labeled and submitted to a contract laboratory for analysis of the compounds indicated in Attachment B. The samples were analyzed in accordance with the contract laboratory's standards, protocols, and validated methodology which is noted as DEN-LC-0012 in the final analytical reports. At the time of this survey, the selected contract laboratory did not have standards and/or validated methods developed for the additional Perfluoridated chemicals (PFCs) noted in the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. As such, the list of compounds indicated in Attachment B reflects the full current analytical capabilities of the contract laboratory as well as the corresponding detection limits with respect to PFCs.

Final analytical results for all wells received to date by Dalton Utilities are attached as Attachments D, E, F, G, H, I, J, K, L, M, N, and O which are provided herein as bound reports titled Test America Laboratories, Inc. Analytical Report on Perfluorocarbon (PFC) Analysis Lot # D9H110160 which contains 642 pages, Lot # D9H120160 which contains 230 pages, Lot # D9H150176 which contains 473 pages, Lot # D9H220152 which contains 480 pages, Lot # D9H250123 which contains 326 pages, Lot # D9H260198 which contains 331 pages, Lot # D9I010246 which contains 700 pages, Lot # D9I020235 which contains 387 pages, Lot # D9I040249 which contains 859 pages, Lot # D9I100275 which contains 276 pages, Lot # D9I120206 which contains 503 pages, and Lot # D9I150267 which contains 277 pages, respectively.

Dalton Utilities has received preliminary results for the remaining private wells; however, final analytical results for these wells have not been received from the contract laboratory. In accordance with the Clean Water Act (CWA) Section 308 Information Request from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009, Dalton Utilities will provide EPA with the final analytical results within five (5) days of receipt of said results.

5. Summary of Analytical Results

A summary of the preliminary and final results are attached herein as Attachment P. Additionally, the GPS coordinates collected for each sample location are noted on Attachment P and were uploaded to Dalton Utilities internal geographic information system (GIS) mapping system. The locations where samples were collected from private water wells are illustrated in Attachment Q.

Upon review, you will notice some of the samples collected from private drinking water wells indicated on Attachment Q are outside of the survey's one mile radius. For these locations, there were insufficient markers in the field to properly determine when the full one mile radius had been surveyed. Therefore, to err on the side of caution, the survey continued in these areas until it was verified that the complete one mile radius had been encompassed in the survey.

As shown in Attachment P, of the 110 private wells sampled, 102 wells (93%) were determined to have levels of PFOA and PFOS below the contract laboratory's reporting limit or level of quantification. Further, as indicated in Attachment P, eight wells out of the 110 sampled (7%) were determined to have levels of PFOA or PFOS at or above the contract laboratory's reporting limit or level of quantification. The respective location of the private well samples determined to have levels of PFOA or PFOS at or above the contract laboratory's method detection limit or level of quantification are indicated in Attachment R.

As shown in Attachment R, only one of these eight wells, less than 1% of the total wells sampled, was determined to be at or slightly above the published public health advisory level for PFOS. None of the wells sampled indicated levels of PFOA above the published public health advisory level.

Additionally, as shown in Attachment P, the quality control duplicates, field blanks, and trip blanks indicate the expected results which illustrates the proper procedures were utilized and no unforeseen contamination occurred during the sampling events.

6. Additional Actions

The one well that indicated a level slightly above the published public health advisory for PFOS in the initial sample was resampled to verify the initial results. The resample of this private well also validated the initial sample results as shown in Attachment P.

Upon receipt of the resample results, the resident was notified of the findings and bottled water provided to the home until such time as access to public water is made available. To date, Dalton Utilities has begun the process of connecting this resident to the closest public water system and will continue to furnish the resident with bottled water in the interim.

The seven wells determined to have levels of PFOA or PFOS at or above the contract laboratory's reporting limit or level of quantification and below the published public health advisory were notified of the results and permission from an adult resident obtained to sample the private drinking water well on a quarterly basis for at least four consecutive quarters for the compounds listed in Attachment B until the level of PFOA and PFOS are demonstrated to be reliably and consistently below the published health advisory levels, the private well is no

longer serving as a supply for drinking water, or the private well serving as supply for drinking water is being treated and maintained to levels below the published health advisory levels (e.g. granular activated carbon) in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

The remaining wells that were determined to have levels of PFOA and PFOS below the contract laboratory's reporting limit or level of quantification were advised of the results and that additional actions were not necessary in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

Further, Dalton Utilities has evaluated these results to determine if the expansion of the survey is warranted. As a sufficient number of private wells, 110 wells, were sampled as part of this private drinking water well survey, no lack of private wells to be sampled in the initial one mile radius was found. Dalton Utilities does not have any data on the sampling of other wells, well construction data, information on specific sources of PFOA and PFOS, or data on the existence of any already identified wells located in close proximity to but outside of the initial one mile radius of this survey to be factored into this evaluation.

As only one private drinking water well indicated a level at or above the published health advisory for PFOS, no private wells indicated a level at or above the published health advisory for PFOA, and only approximately 7% of the private wells sampled indicated a level of PFOA or PFOS at or above the contract laboratory's reporting limit or level of quantification, the sample results do not indicate a necessity to expand the private well survey beyond the initial one mile radius from the LAS property boundary. This is further supported by the fact that the one well that exhibited PFOS at or slightly above the published public health advisory level is located immediately adjacent to the land application system property.

7. Future Reports

All additional actions as part of this survey will be reported to EPA as part of the monthly progress report in accordance with the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009. Any additional final sample results received by Dalton Utilities as part of the initial survey or quarterly monitoring will be submitted to EPA within five (5) days as stipulated in the Clean Water Act (CWA) Section 308 letter from Mr. James Giattina, EPA, to Dalton Utilities dated October 6, 2009.

North Georgia Health District District 1, Unit 2

Harold W. Pitts, M.D., J.D. District Health Director

Georgia Department of Human Resources

100 West Walnut Ave., Suite 92 Dalton, Georgia 30720

(706) 272-2342

FAX (706) 272-2221

October 20, 2009

Dena Haverland Regulatory Compliance Manager Dalton Utilities 1200 Parrott, Jr. Parkway P.O. Box 869 Dalton, GA 30722

RE: Request for Intent to Drill Forms

Dear Dena,

I checked with our environmental health offices in Whitfield and Murray Counties. Murray had a few old forms but none for wells within a one-mile radius of the subject property. Whitfield reported having no intent-to-drill forms.

I was working in public health in 1985 when the Georgia Well Water Standards Act was passed. At first we received great numbers of intent-todrill forms but over the years compliance declined so that now we receive almost none from well drillers. This seems to be the typical condition throughout Georgia unless a county board of health passes a well location ordinance. Georgia EPD is the governing agency for well drillers and intentto-drill forms.

I'm sorry we could not be of more help. Please call me if you have any questions or if I may otherwise be of assistance.

Sincerely,

Raymond R. King

District Director of Environmental Health

List of Perfluoridated Compounds (PFC) for Chemical Analyses

As Revised June 17, 2009, by EPA

Compound	Acronym	Reporting Limit (RL) ug/l	Method Detection Limit (MDL) ug/l					
Perfluorobutanoic acid	C4	0.02	0.0062					
Perfluoropentanoic acid	C5	0.03	0.0082					
Perfluorohexanoic acid	C6	0.02	0.0030					
Perfluoroheptanoic acid	C7	0.02	0.0054					
Perfluorooctanoic acid	C8 / PFOA	0.02	0.0055					
Perfluorononanoic acid	C9	0.02	0.0065					
Perfluorodecanoic acid	C10	0.02	0.0026					
Perfluoroundecanoic acid	C11	0.02	0.0025					
Perfluorododecanoic acid	C12	0.02	0.0040					
Perfluorotridecanoic acid	C13	0.02	0.0072					
Perfluorotetradecanoic acid	C14	0.02	0.0087					
Perfluorobutane sulfonate	PFBS	0.02	0.0045					
Perfluorohexane sulfonate	PFHxS	0.03	0.0084					
Perfluorooctane sulfonate	PFOS	0.02	0.0068					
Perfluoroctane sulfonamide	PFOSA	0.05	0.0057					

Locations Where Sampling Was Refused

Address	Date				
190 Zeke Allen Road	8/31/2009				
5347 Hwy 225	9/3/2009				
622 Center Hill Church Road	9/3/2009				
955 Center Hill Church Road	9/3/2009				
1261 Center Hill Church Road	9/3/2009				

J - Estimated Result. Result is lower than reporting limit

Attachment P to Dalton Utilities Private Drinking Water Well Monitoring Report

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PFOSA	(qdd)	2	9	Q.	Q.	Q	Q.	2	QN	Q	Q	Q	Q.	₽ Q	Q	QN	2	2	Q	QN	Q	Q
PFHxS	(qdd)	2	2	2	2	₽	2	2	S	9	2	2	0.056	Ð	2	₽	0.068	S	9	Q	₽	QN
PFBS	(qdd)	Q	2	S	9	2	2	2	2	2	₽	S	0.037	2	2	2	0.038	S	S	QN	身	QV.
PFTeA	(qdd)	S	Q	2	2	2	9	g	S	₽	₽	2	₽	₽	S	S	Q	₽	£	QN	Ð	2
PFTA	(qdd)	S	S	2	2	2	2	2	S	2	g	9	S	g	g	S	2	Q	₽	₽	₽	Q
PFDoA	(qdd)	S	2	S	2	2	2	Q	S	Q	S	QV.	2	S	S	9	Q	S	₽	2	9	S
PFUnA	(qdd)	Q	2	Q	2	2	Q	2	2	Q	2	₽	₽	2	Q	S	2	2	2	Q	2	S
PFDA	(qdd)	Q	2	2	₽	2	₽	S	£	₽	S	g	S	9	Q	2	S	₽	9	Q	S	Q
PFNA	(qdd)	9	Q	9	Ð	g	9	ð	2	Q	Q	2	2	Q	S	2	2	g	Q	Q	QN	S
PFHpA	(qdd)	QN	9	₽	₽	S S	9	2	9	₽	S	Q	0.04	QN	9	Q	0.047	QN	QN	QN	QN	S
PFHXA	(qdd)	QN	2	Q	Q	0.0096	Q	QN	S	ð	2	Q	0.061	QN	Q	Q	0.065	QN	QN	Q	QN	9
PFPA	(qdd)	QN	9	Q	ΩN	QN	QN	QN	₽	Q	Q	2	J 0.035	ON	2	QN	J 0.039	QN	QN	QN	ND	2
PFBA	(ppb)	QN	g	Q	QN	0.011	QN	QN	Q	QN	QN	QN	0.017	ND	QN	QN	0.017	QN	QN	QN	QN	QN
PFOS	(qdd)	9	Q	QN	QN	ON f	QN	QN	QN	QN	QN	QN	0.056	QN	QN	QN	0.062	QN	ND	S	QN	QN
PFOA	(ddd)	ND	Q	QN	QN	0.017	QN	Q	QN	QN	QN	QN	0.084	QN	QN	QN	0.089	QN	QN	QN	Q	QN
	Longitude	34.70736269	34.69316186	34.63655358	34.6372526	34.6526412	34.70219682	34.69280948	34.700633	34.70136457	34,70482304	34.7056123	34.71838353	34.7337633	34.70736269	34.7056123	34.71838353	34.7337633	34.70067393	34.72722865	34.70067393	34.72722865
	Lattitude	-84.83904855	-84.83628197	-84.85555811	-84.85420659	-84.80239815	-84.82083469	-84.81047182	-84.84170505	-84.84137941	-84.84205471	-84.87792202	-84.9531046	-84.90769191	-84.83904855	-84.87792202	-84.9531046	-84.90769191	-84.97533891	-84.88605926	-84.97533891	-84.88605926
	Location	366 Kirby Young Road	301 Buford Ridley Road	9532 Hwy 225	9458 Hwy 225	1585 Cagle Road	4249 Hwy 225	383 Center Hill Church Road	440 Fox Bridge Road	378 Fox Bridge Road	149 Edd Ridley Road	85 Meadow Road	705 Peek Road	240 Matlock Road	Dup - 366 Kirby Young Rd	Dup - 85 Meadow Road	Dup - 705 Peek Road	Dup - 240 Matlock Road	210 Mansfield Road	1257 Sane Road	Dup - 210 Mansfield Road	Dup - 1257 Sane Road
Sample ID	2	100	101	102	103	104	105	106	107	108	109	110	111	112	Dup	Dup 2	Dup 3	Dup 4	113	114	Dup 5	Dup 6